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JAN 23 2017

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW MEXICO

MOODY & WARNER, P.C.

EMPLOYBRIDGE, LLC, a California
Limited Liability Company, and
**EMPLOYMENT SOLUTIONS
MANAGEMENT, INC.**, a Georgia
Corporation,

Plaintiffs,

v.

RIVEN ROCK STAFFING, LLC, a Nevada
Limited Liability Company, **LARRY SHAUN
SHEPHERD**, an individual, **CATHERINE
OLINGER**, an individual, **TERRY
MILLER**, and individual, **TIMOTHY
JACQUEZ**, an individual, and Does 1 through
25, inclusive,

Defendants.

Case No. 16-833-WJ/KK

VERIFICATION

I, Fran Scott, pursuant to 28 U.S.C. § 1746, state that I am the Market Leader for the Albuquerque, New Mexico, ProDrivers division of EmployBridge, LLC, a party in the above-captioned action. I am authorized to make this verification for and on behalf of EmployBridge, LLC, and Employment Solutions Management, Inc., and make this verification for that purpose.

I have read Plaintiffs' Answers To Defendant Riven Rock Staffing, LLC's First Set Of Interrogatories To Plaintiffs, and know the contents thereof. I am informed and believe that the information contained in these responses is true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 30, 2016, at Albuquerque, New Mexico.

Signature: _____


Fran Scott

CERTIFICATE OF SERVICE RE:

VERIFICATION [Plaintiffs' Answers to Defendant Riven Rock Staffing, LLC's First Set of Interrogatories to Plaintiffs]

I certify that on January 18, 2017, a true and correct copy of the above-referenced documents were served on Defendants via U.S. mail, with courtesy copy by email, to the following counsel of record:

Christopher M. Moody
Repps D. Stanford
4169 Montgomery Blvd., N.E.
Albuquerque, NM 87109
chavez@nmlaborlaw.com

DATED: January 18, 2017

SEYFARTH SHAW LLP,

/s/ Michael G. Cross /